

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**JOINDER OF PUERTO RICO FISCAL AGENCY AND FINANCIAL ADVISORY
TO RESPONSE OF THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD
FOR PUERTO RICO TO INTERIM REPORT AND RECOMMENDATION OF THE
MEDIATION TEAM [ECF NO. 9493]**

To the Honorable United States District Judge Laura Taylor Swain:

The Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”), on its own behalf and as an entity authorized to act on behalf of all of Puerto Rico’s governmental entities (collectively, the “Government”), by the Enabling Act of the Fiscal Agency and Financial Advisory Authority, Act 2-2017 (the “Enabling Act”), respectfully submits this joinder (the “Joinder”) to the Financial Oversight and Management Board’s (“FOMB”) *Response of the Financial Oversight and Management Board for Puerto Rico to Interim Report and*

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations). The Title III cases commenced by the Commonwealth, COFINA, HTA, ERS, PREPA, and PBA are referred to herein as the “Title III Cases.”

*Recommendation of the Mediation Team*² (the “Response”) [ECF No. 9493]. AAFAF hereby joins, as of the date of the filing of this Joinder, in the Response, for the reasons set forth herein:

BACKGROUND

1. On November 27, 2019, the mediation team appointed in the Title III Cases (the “Mediation Team”) filed the Interim Report. [ECF No. 9365] Attached to the Interim Report, the Mediation Team included *Proposed Interim Case Management Orders* in connection with, *inter alia*, the Claim Objections, GO Lien Challenges, Lift Stay Motions, Revenue Bond Complaints and HTA Adversary Proceedings³ (the “Interim Orders”). [ECF No. 9365-1; 9365-2]

2. On December 6, 2019, the FOMB filed the Response, wherein the FOMB proposed revisions to certain respects of the Interim Orders⁴. [ECF No. 9493]

3. Because AAFAF deems that the revisions proposed by the FOMB in the Response are geared towards the conservation of resources and the maximization of efficiency of the matters to be dealt with by the Mediation Team, AAFAF hereby joins in the FOMB’s Response.

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² The “Interim Report” refers to the Interim Report and Recommendation of the Mediation Team in ECF No. 9365.

³ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Interim Report and the attachments thereto.

⁴ Notwithstanding, the FOMB clarified that it does not currently propose any modifications to the Interim Order regarding GO Bonds.

Dated: December 6, 2019
San Juan, Puerto Rico

Respectfully submitted,

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